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11 *Attorneys for Plaintiffs Broadcast Music, Inc., Cotillion Music, Inc.,*
12 *Terry Stafford Music Co., Sony/ATV Songs LLC d/b/a Sony/ATV Tree*
13 *Publishing, Sony/ATV Songs LLC, and House of Cash, Inc.*

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BROADCAST MUSIC, INC.; COTILLION
MUSIC, INC.; TERRY STAFFORD MUSIC CO.;
SONY/ATV SONGS LLC d/b/a SONY/ATV TREE
PUBLISHING; SONY/ATV SONGS LLC; HOUSE
OF CASH, INC.,

Plaintiffs,
vs.

TRM HOSPITALITY LLC d/b/a LEGENDS
SPORTS BAR & GRILL and JAMES MURPHY,
individually,

Defendants.

Case No.: 2:20-cv-00309-APG-VCF

**PLAINTIFFS' UNOPPOSED
MOTION TO EXTEND DEADLINE
TO RESPOND TO DEFENDANT
JAMES MURPHY'S MOTION TO
DISMISS [ECF NO. 8]**

(THIRD REQUEST)

ORDER

Plaintiffs, Broadcast Music, Inc. ("BMI"), Cotillion Music, Inc., Terry Stafford Music Co., Sony/ATV Songs LLC d/b/a Sony/ATV Tree Publishing, Sony/ATV Songs LLC, and House of Cash, Inc. (collectively, "Plaintiffs"), by and through their counsel, Armstrong Teasdale LLP, hereby move pursuant to Fed. R. Civ. P. 6 and Local Rule LR IA 6-1, to extend the deadline to respond to Defendant James Murphy's Motion to Dismiss (ECF No. 8), which was filed on March 4, 2020, by an additional thirty (30) days so that Plaintiffs' response would be due on July 6, 2020 (instead of the current deadline of June 3, 2020). Undersigned counsel communicated with Defendant James Murphy via telephone on June 2, 2020, regarding this extension request, and Mr. Murphy was in agreement to a 30 day extension. This is the third request to extend this particular deadline. A

1 hearing is not presently scheduled for the Motion to Dismiss.

2 Good cause exists to extend the deadline for Plaintiffs to respond to the Motion to Dismiss by
3 an additional 30 days, or to July 6, 2020. In light of the present COVID-19 pandemic prompting
4 Governor Sisolak to issue numerous Emergency Directives requiring the closure of gaming
5 operations in Nevada, which includes Defendant TRM Hospitality LLC dba Legends Sports Bar &
6 Grill (“Legends”) as it is a gaming bar and restaurant in Clark County, Nevada, Plaintiffs believe
7 that additional time is appropriate to allow Defendants operations to resume before requiring
8 Mr. Murphy, who is currently proceeding in proper person, to actively participate in this litigation.
9 Furthermore, the additional time will allow the parties to discuss settlement and reasonable
10 accommodations under these ever evolving circumstances. This request for an additional 30 day
11 extension to respond to the Motion to Dismiss is made in good faith and is not intended to
12 unreasonably delay this matter. In particular, this case was recently filed on February 13, 2020, and
13 per the Scheduling Order, discovery does not close until the end of November 2020 (ECF No. 13).

14 On June 2, 2020, undersigned counsel communicated with Plaintiff James Murphy via
15 telephone to discuss this extension request. Mr. Murphy was in agreement with Plaintiffs seeking
16 this 30 day extension.

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1 Based on the foregoing, Plaintiffs respectfully request that this Court extend their deadline to
2 respond to the Motion to Dismiss by 30 days, or to July 6, 2020.

3 DATED this 2nd day of June, 2020.

ARMSTRONG TEASDALE LLP

4 By: 

5 MICHELLE D. ALARIE, ESQ.

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8 *Attorneys for Plaintiffs Broadcast Music, Inc.,*
Cotillion Music, Inc., Terry Stafford Music Co.,
Sony/ATV Songs LLC d/b/a Sony/ATV Tree Publishing,
Sony/ATV Songs LLC, and House of Cash, Inc.

10 **ORDER**

11 **IT IS SO ORDERED.**

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13 UNITED STATES DISTRICT JUDGE

14 Dated: June 2, 2020.

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